REMARKS

In the Official Action mailed on **02 January 2009**, the Examiner reviewed claims 1-28. Examiner rejected claims 1-28 under 35 U.S.C. § 102(b) based on Hanson et al. (U.S. Patent No. 6,148,346, hereinafter "Hanson").

Rejections under 35 U.S.C. § 102(b)

Examiner rejected Independent claims 1, 11, and 20 as being anticipated by Hanson. Applicant respectfully disagrees with this rejection. Hanson does not disclose a universal contextual interface that does **not** have a priori knowledge of the devices' **file system domain protocol** or the devices' **printer domain protocol**, where the devices' file system domain protocol comprises **Network File System** (NSF) or **Common Internet File System** (CIFS), and where the devices' printer domain protocol comprises **Internet Printing Protocol** (IPP) or **Line Printer Daemon.**

Hanson discloses a **device driver** with "an operating system (OS) independent device driver portion and an OS specific device driver portion" (Hanson, C3:L27-30). As is well-known in the art, a device driver **converts** data from a file or an application into a form that can then be used by a hardware device. For example, a printer driver converts data to be printed to the form specific to the printer. Thus a device driver acts as an abstraction layer between a hardware device and applications and operating systems that use the device. Hanson, C4:L21-57 discloses exactly such a device driver. For example,

> ...if the peripheral device is a printer, the peripheral specific data objects 54 include information about the printer's paper trays, the printer's formatting requirements, etc. (Hanson, C4:L52-55).

Elsewhere, Hanson expressly states that the device driver **formats** the data for a peripheral device: "...the document must be correctly formatted by a device driver specific to the peripheral device" (Hanson, C3:L34-36). In short, the

function of the device driver in Hanson (and as well-known in the art) is to **convert** data.

Moreover, in the Hanson system, communication to a device **requires** at least some type of file system or communication protocol such as a file system domain protocol (e.g., NFS or CIFS) or a printer domain protocol (e.g., IPP or LPR). Hanson discloses a File Transfer Protocol (FTP) in Hanson, C3:L32-35), but is silent on other such protocols.

In contrast, embodiments of the present invention involve a universal contextual interface that does **not** have a priori knowledge of the devices' **file system domain protocol** or the devices' **printer domain protocol**, where the devices' file system domain protocol comprises **Network File System** (NSF) or **Common Internet File System** (CIFS), and where the devices' printer domain protocol comprises **Internet Printing Protocol** (IPP) or **Line Printer Daemon** (instant application, pars. [0001] and [0003]-[0004]). NFS allows users to access files across a network and treat them as if they resided in a local file directory. CIFS allows programs to make requests for files and services on remote computers on the Internet. Furthermore, IPP includes functions such as allowing the user to submit a print job, finding out about the printer's capabilities, finding out about a print job's status, and cancelling a print job. Similarly, LPD is a set of programs that provide printer spooling and network print server functionality for Unix-like systems, including assigning a job to a queue, displaying jobs assigned to a queue, removing a job from a queue, and controlling a queue.

Neither NFS, CIFS, IPP, nor LPD **converts** data between the operating system or an application and a device. That task is the job of a **device driver**. Note that an operating system might have a device driver that tells it how to convert a document into a specific printer's language but it might not be able to communicate with the printer to submit a job (i.e., it might not know IPP or LPD). Thus, NFS, CIFS, IPP, and LPD are **not** the same as device drivers.

Note that Hanson does not disclose the following **negative** limitation: a universal contextual interface that does **not** have a priori knowledge of the

devices' **file system domain protocol** or the devices' **printer domain protocol**, where the devices' file system domain protocol comprises **Network File System** (NSF) or **Common Internet File System** (CIFS), and where the devices' printer domain protocol comprises **Internet Printing Protocol** (IPP) or **Line Printer Daemon.**

Accordingly, Applicant has amended independent claims 1, 11, and 20 to clarify that embodiments of the present invention involve the aforementioned features. These amendments find support in instant application, pars. [0001] and [0003]-[0004]. No new matter has been added.

Hence, Applicant respectfully submits that independent claims 1, 11, and 20 as presently amended are in condition for allowance. Applicant also submits that claims 2-10, which depend upon claim 1, claims 12-19, which depend upon claim 11, and claims 21-28, which depend upon claim 20, are for the same reasons in condition for allowance and for reasons of the unique combinations recited in such claims.

CONCLUSION

It is submitted that the present application is presently in form for allowance. Such action is respectfully requested.

Respectfully submitted,

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